



U.S. Department of Justice

United States Attorney  
Southern District of New York

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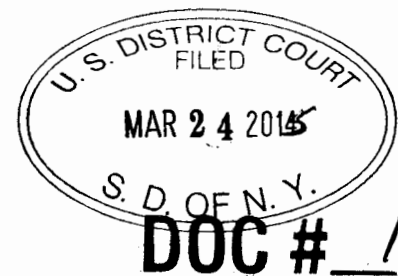
March 24, 2015

**By Email**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMORANDUM ENDORSED**

Re: *United States of America v. Jon Cruz*  
15 Mag. 706 (UA)



Dear Judge Woods:

The Government respectfully submits this letter regarding the bail conditions for defendant Jon Cruz. As the Court is aware, the New York City Department of Education ("DOE") sought on March 13, 2015 to modify the terms of the defendant's bail to allow the defendant to attend a probable cause hearing regarding his payroll status as a city employee. The Court denied the DOE's request on the ground that the DOE lacked standing to seek modification of the terms of Cruz's pre-trial release. The Court directed that the DOE consult the Government and defense counsel regarding its request, and that the Government confer with defense counsel and Pretrial Services to determine whether further application concerning the defendant's bail conditions should be made.

Having conferred, the parties jointly request that Cruz's bail conditions be modified to allow the defendant to leave his parents' home to attend a probable cause hearing scheduled by the DOE and Pretrial Services. The parties and Pretrial Services further request that the modified conditions specify that the time, date, location, and duration of the hearing be

approved by Pretrial Services, and that Cruz be accompanied to and from the hearing by his attorney and at least one of his parents.

Respectfully submitted,

PREET BHARARA  
United States Attorney  
Southern District of New York


By: \_\_\_\_\_/s/\_\_\_\_\_  
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Assistant United States Attorney  
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cc: Steve Zissou, Esq.  
Jason Lerman, Pretrial Services

Application granted. Mr. Cruz may leave his parents' home to attend a probable cause hearing scheduled by the DOE and Pretrial Services. The date, time, location, and duration of the hearing must be approved by Pretrial Services. Mr. Cruz must be accompanied to and from the hearing by his attorney and at least one of his parents. Mr. Cruz must return to home incarceration in his parents' home immediately following the end of the hearing.

SO ORDERED.

Dated: March 24, 2015  
New York, New York

  
GREGORY H. WOODS  
United States District Judge